

IN THE DISTRICT COURT OF COOKE COUNTY, TEXAS
235TH JUDICIAL DISTRICT

NELSON WILLIS,
Respondent,

v.

ADAM M. ARON,
Petitioner.

Case No.: 23-CV-00179

RESPONDENT'S MOTION FOR SUMMARY JUDGMENT

I. Introduction

Respondent Nelson Willis, Pro Se, respectfully submits this Motion for Summary Judgment (SEE EXHIBIT A - FEDERAL SUMMARY JUDGEMENT FILED 07/29/24), against Petitioner Adam M. Aron. This motion is based on the procedural misconduct, fraudulent activities, and strategic misrepresentations perpetrated by the petitioner and his attorneys, which have fundamentally undermined the integrity of the judicial process and caused irreparable harm to the respondent.

II. Factual Background

1. Deceptive Tactic by Filing Notice of Nonsuit: On July 31, 2023, at 4:58 PM CST, the petitioner's attorneys filed a Notice of Nonsuit Without Prejudice in the 235th District Court of Texas. This notice was filed approximately 7 (seven) hours after the Kansas Johnson County Sheriff's Department served subpoenas on the Vice President of Investor Relations, John Merriwether, for key evidence. The timing and circumstances indicate this notice was a deceptive tactic intended to mislead the court and buy time.

2. Failure to Finalize Nonsuit: Despite filing the notice, the necessary procedural steps to finalize this nonsuit were never completed. Attorney Richard Illmer filed the nonsuit, but had not read the transcript. Once Attorney Richard Illmer realized Attorney Meghann Reeves stated in court on July 21, 2023, that all evidence had been submitted, Attorney Richard Illmer realized he could no longer file the Motion for Nonsuit Without Prejudice and therefore, no judge's order was signed, leaving the case active and open in the state court. This intentional violation has significantly prejudiced the respondent's position in the federal case.

3. Fraudulent Activities and Forged Affidavit: (SEE EXHIBIT C) The petitioner's attorneys, Richard Illmer and Meghann Reeves, engaged in a pattern of deceit and misrepresentation, including submitting a forged affidavit to manipulate the judicial process. Their actions have caused severe harm to the respondent, who has been falsely portrayed and unjustly targeted.

4. Misleading Federal Court: (SEE EXHIBIT B – Case no. 04:23-CV-00732 DOCKET)

The federal court's decisions, including the denial of the respondent's emergency motions to halt the June 5, 2024, shareholder meeting, were based on the incorrect assumption that the state court case

OPEN
Case →

FILED IN DISTRICT COURT
COOKE COUNTY, TEXAS

2024 JUL 30 1AM 11:49

DIST CLERK-HARCI A GILBERT

BY: C. Watterseheld
RECEIVED

NO
Nonsuit

B

was dismissed. This procedural misconduct and the deceptive tactic by the petitioner have significantly affected the respondent's case not only in the 235th District Court of Texas but also in the United States District Court Eastern District of Texas, Sherman Division.

5. Hostile Witness Subpoena and Retaliation: Respondent subpoenaed John Merriwether on July 31, 2023, at approximately 8:30 AM CST, as a hostile witness to be questioned under oath on August 7, 2023, at 2:45 PM CST. In retaliation, the petitioner filed a notice of nonsuit to evade compliance and scrutiny.

6. Evidence Submitted by Affidavit: In the lower court, Petitioner's attorney, Meghan Reeves, stated in the transcript (Exhibit D) that all evidence had been submitted by affidavit, making the nonsuit illegal as it precludes new evidence without court approval.

III. Legal Standards

Under Rule 166a of the Texas Rules of Civil Procedure, summary judgment is appropriate when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The respondent bears the burden of demonstrating the absence of a genuine issue of material fact.

IV. Argument

1. Procedural Misconduct and Fraudulent Activities

- The petitioner's attorneys have engaged in procedural misconduct by filing a Notice of Nonsuit without following through with the necessary procedural steps to finalize it. This deceptive tactic was intended to mislead the court and obstruct justice. Their submission of a forged affidavit further compounds their fraudulent conduct.
- Supporting Case Law: C/S Solutions, Inc. v. Energy Maintenance Services Group, LLC (274 S.W.3d 299, 308 (Tex. App.—Houston [1st Dist.] 2008, no pet.))

2. Violation of Constitutional Rights

- The petitioner's actions have violated the respondent's Sixth Amendment rights to a fair trial and due process. The deceptive tactic and procedural misconduct have denied the respondent a fair and just legal process.
- Supporting Case Law: Mullins v. TestAmerica Inc., 564 F.3d 386, 401 (5th Cir. 2009)

3. Extrinsic Fraud

- The concealment of material facts and fraudulent representations by the attorneys constitute extrinsic fraud. This type of fraud prevents a party from fully presenting their case and is grounds for setting aside a judgment.
- Supporting Case Law: Montgomery v. Kennedy, 669 S.W.2d 309, 311 (Tex. 1984)

4. Irreparability of Harm

- The petitioner's actions have caused irreparable harm to the respondent, who has suffered significant emotional, financial, and reputational damage. The fraudulent and deceitful conduct of the petitioner's attorneys necessitates immediate and severe relief.

V. Legal Ramifications of Procedural Misconduct

The actions of the petitioner's attorneys in filing a Notice of Non-suit and then failing to follow through with the necessary procedural steps, while continuing to represent that the case was dismissed, constitute a serious ethical violation. Misrepresenting the status of a case to the court, particularly in a way that misleads the court and other parties, can be considered fraudulent conduct and may rise to the level of criminal fraud, potentially classified as a felony. This conduct has severely undermined the integrity of the judicial process and warrants significant sanctions.

VI. Relief Requested

In light of the above arguments, the respondent respectfully requests that this Court:

- 1. Grant Summary Judgment in Favor of the Respondent:** Recognize the procedural misconduct and fraudulent activities of the petitioner and his attorneys.
- 2. Award Compensatory Damages:** \$1,000,000 for the harm suffered by the respondent. This amount is justified by the destruction of two court cases, one in the state court and one in the federal court, causing significant financial and emotional damage to the respondent. The federal court case was poised to seek \$20 million in compensatory damages due to the extensive harm caused by the petitioner's actions.
- 3. Award Punitive Damages:** \$10,000,000 to deter future misconduct and to punish the petitioner and his attorneys for their egregious actions. This amount reflects the malicious and pernicious procedural misconduct that undermined the integrity of both the state and federal court processes and considers the financial standing and wealth of the individuals involved. The federal court case included a claim for \$100 million in punitive damages due to the severe and intentional harm inflicted by the petitioner's actions.
- 4. Terminate Case in Respondent's Favor:** Order the termination of Case No. 23-CV-00179 in the respondent's favor due to the procedural misconduct and fraudulent activities of the petitioner and his attorneys.
- 5. Impose Sanctions Against the Attorneys:** Impose significant sanctions against the petitioner's attorneys, Richard Illmer and Meghann Reeves, for their procedural misconduct and fraudulent actions. These sanctions should include fines and any other penalties the Court deems appropriate to ensure accountability and to deter future misconduct.
- 6. Bar on Appeals:** Include a clause that the summary judgment is final and not subject to appeal by the petitioner.

VII. Conclusion

The procedural misconduct, deceptive tactics, and fraudulent activities of the petitioner and his attorneys have fundamentally undermined the judicial process and caused irreparable harm to the respondent. The respondent respectfully requests that this Court grant the relief requested and ensure that justice is served.

Sincerely,

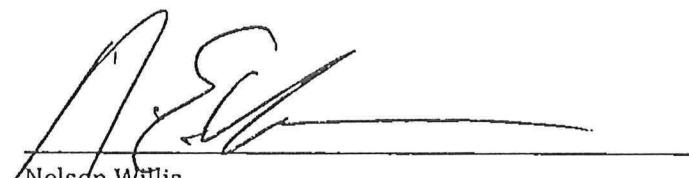


Nelson Willis
Respondent Pro Se
1405 County Road 208
Gainesville, TX 76240
Phone: 972-533-4126
Email: nelsonwillis3@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this July 30, 2024, a true and correct copy of the foregoing Respondent's Motion for Summary Judgment was filed electronically. Notice of this filing will be sent to all parties and counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Respectfully submitted,



Nelson Willis
Respondent Pro Se
1405 County Road 208
Gainesville, TX 76240
Phone: 972-533-4126
Email: nelsonwillis3@gmail.com

EXHIBITS

Exhibit A: Federal Summary Judgment (Exhibit A) (Exhibit A)

Exhibit B: Federal Court Case Docket Sheet (Exhibit B) (Exhibit B)

Exhibit C: Comparison of Signatures (Exhibit C) (Forgery Evidence)

Exhibit D: Transcript case no. 23-cv-00179

IN THE DISTRICT COURT OF COOKE COUNTY, TEXAS
235TH JUDICIAL DISTRICT

NELSON WILLIS,
Respondent,

v.

ADAM M. ARON,
Petitioner.

THE HONORABLE JANELLE M. HAVERKAMP

Case No.: 23-CV-00179

[PROPOSED] ORDER GRANTING SUMMARY JUDGMENT

Before the Court is Respondent Nelson Willis's Motion for Summary Judgment. Upon consideration of the motion, the supporting evidence, and the entire record, the Court finds that there is no genuine dispute as to any material fact and that the Respondent is entitled to judgment as a matter of law.

IT IS HEREBY ORDERED THAT:

1. Summary Judgment is GRANTED in favor of the Respondent, Nelson Willis.
2. The Petitioner, Adam M. Aron, is ordered to pay the Respondent compensatory damages in the amount of \$1,000,000.
3. The Petitioner, Adam M. Aron, is ordered to pay the Respondent punitive damages in the amount of \$10,000,000.
4. The pending case No. 23-CV-00179 is TERMINATED in the Respondent's favor.
5. This summary judgment is final and not subject to appeal by the Petitioner.

IT IS SO ORDERED.

Signed this August _____, 2024.

Hon. Janelle M. Haverkamp
District Judge
235th Judicial District Court
Cooke County, Texas

Exhibit

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED

JUL 29 2024

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

NELSON WILLIS,

Plaintiff,

v.

ADAM M. ARON,

Defendant.

Case No.: 4:23-cv-00732-ALM

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

I. Introduction

Plaintiff Nelson Willis, Pro Se, respectfully submits this Motion for Summary Judgment against Defendant Adam M. Aron. This motion is based on the procedural misconduct, fraudulent activities, and strategic misrepresentations perpetrated by the defendant and his attorneys, which have fundamentally undermined the integrity of the judicial process and caused irreparable harm to the plaintiff.

II. Factual Background

1. Strategic Bluff by Filing Notice of Nonsuit: On July 31, 2023, at 4:58 PM CST (**EXHIBIT A**), the defendant's attorneys filed a Notice of Nonsuit Without Prejudice in the 235th District Court of Texas. This notice was filed approximately 8.5 hours after the Kansas Johnson County Sheriff's Department served subpoenas (**EXHIBIT E**) on the Vice President of Investor Relations, John Merriwether, for key evidence. The timing and circumstances indicate this notice was a strategic bluff intended to mislead the court and buy time.

2. Failure to Finalize Nonsuit: Despite filing the notice, the necessary procedural steps to finalize this nonsuit were never completed. (**SEE EXHIBIT B 235TH DISTRICT COURT DOCKET SHEET**). Attorney Richard Illmer filed the nonsuit but had not read the transcript. (**SEE EXHIBIT D TRANSCRIPT 23-CV-00179**). Once Attorney Richard Illmer realized Attorney Meghan Reeves stated in court on July 21, 2023, that all evidence had been submitted, Attorney Richard Illmer realized he could no longer file the Motion for Nonsuit Without Prejudice and therefore, no judge's order was signed, leaving the case

FILED IN DISTRICT COURT
COKE COUNTY, TEXAS
2024 JUL 30 AM 11:52
DIST CLERK MARCI A GILBERT
BY: Cwotzschwld
DEPUTY

active and open in the state court. This intentional violation has significantly prejudiced the plaintiff's position in the federal case.

3. Fraudulent Activities and Forged Affidavit: The defendant's attorneys, Richard Illmer and Meghann Reeves, engaged in a pattern of deceit and misrepresentation, including submitting a forged affidavit (**SEE EXHIBIT C AFFIDAVIT OF ADAM M. ARON THE COURT CLERK DOES NOT HAVE THE AFFIDAVIT MS. REEVES BROUGHT TO COURT ON JULY 21 2023**) to manipulate the judicial process. Their actions have caused severe harm to the plaintiff, who has been falsely portrayed and unjustly targeted.

4. Misleading Federal Court: The federal court's decisions, including the denial of the plaintiff's emergency motions to halt the June 5, 2024, shareholder meeting, were based on the incorrect assumption that the state court case was dismissed. This procedural misconduct and the strategic bluff by the defendant have significantly affected the plaintiff's case not only in the 235th District Court of Texas but also in the United States District Court Eastern District of Texas, Sherman Division.

5. Hostile Witness Subpoena and Retaliation: Plaintiff subpoenaed John Merriwether on July 31, 2023, at approximately 8:30 AM CST as a hostile witness to be questioned under oath on August 7, 2023, at 2:45 PM CST. In retaliation, the defendant filed a notice of nonsuit to evade compliance and scrutiny.

6. Evidence Submitted by Affidavit: In the lower court, Defendant's attorney, Meghann Reeves, stated in the transcript (**Exhibit D**) that all evidence had been submitted by affidavit, making the nonsuit illegal as it precludes new evidence without court approval.

III. Legal Standards

Under Rule 56 of the Federal Rules of Civil Procedure, summary judgment is appropriate when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The plaintiff bears the burden of demonstrating the absence of a genuine issue of material fact. Due to the procedural misconduct and fraudulent actions by the defendant's attorneys, all filings by the defense in this federal case are rendered fraudulent and invalid, thus meeting the criteria for summary judgment under FRCP Rule 56.

IV. Argument

1. Procedural Misconduct and Fraudulent Activities

- The defendant's attorneys have engaged in procedural misconduct by filing a Notice of Nonsuit without following through with the necessary procedural steps to finalize it. This strategic bluff was intended to mislead the court and obstruct justice. Their submission of a forged affidavit further compounds their fraudulent conduct.
- **Supporting Case Law:** C/S Solutions, Inc. v. Energy Maintenance Services Group, LLC (274 S.W.3d 299, 308 (Tex. App.—Houston [1st Dist.] 2008, no pet.))

2. Violation of Constitutional Rights

- The defendant's actions have violated the plaintiff's Sixth Amendment rights to a fair trial and due process. The strategic bluff and procedural misconduct have denied the plaintiff a fair and just legal process.

- **Supporting Case Law:** *Mullins v. TestAmerica Inc.*, 564 F.3d 386, 401 (5th Cir. 2009)

3. Extrinsic Fraud

- **The concealment of material facts and fraudulent representations** by the attorneys constitute extrinsic fraud. This type of fraud prevents a party from fully presenting their case and is grounds for setting aside a judgment.

- **Supporting Case Law:** *Montgomery v. Kennedy*, 669 S.W.2d 309, 311 (Tex. 1984)

4. Irreparability of Harm

- The defendant's actions have caused irreparable harm to the plaintiff, who has suffered significant emotional, financial, and reputational damage. The fraudulent and deceitful conduct of the defendant's attorneys necessitates immediate and severe relief.

5. Legal Ramifications of Procedural Misconduct

- The actions of the defendant's attorneys in filing a Notice of Nonsuit and then failing to follow through with the necessary procedural steps while continuing to represent that the case was dismissed constitute a serious ethical violation. Misrepresenting the status of a case to the court, particularly in a way that misleads the court and other parties, can be considered fraudulent conduct and may rise to the level of criminal fraud, potentially classified as a felony. This conduct has severely undermined the integrity of the judicial process and warrants significant sanctions.

6. Fraudulent Nature of Federal Court Filings

- Due to the procedural misconduct and fraudulent misrepresentation of the status of the state court case, all filings by the defendant's attorneys in the federal court case (Case No.: 4:23-cv-00732) are rendered fraudulent. This includes their motion to dismiss, motion for protective order, and all subsequent filings and objections. The integrity of these documents is compromised due to the attorneys' willful misrepresentation and fraudulent conduct.

V. Relief Requested

In light of the above arguments, the plaintiff respectfully requests that this Court:

1. Grant Summary Judgment in Favor of the Plaintiff: Recognize the procedural misconduct and fraudulent activities of the defendant and his attorneys.

2. Award Compensatory Damages: \$500,000 for the harm suffered by the plaintiff.

3. Award Punitive Damages: \$25,000,000 against the defendant and an additional \$25,000,000 against the attorneys and their law firm to deter future misconduct and to punish the defendant and his attorneys for their egregious actions.

4. Dismissal of Criminal Harassment Case in Leawood, Kansas: Order the dismissal of the pending criminal harassment charges against the plaintiff in Leawood, Kansas.

5. No Immunity for Defendants: State that the defendants shall not be granted immunity from re-filing of the amended complaint and the lawsuit against the attorneys.

6. Grant Plaintiff's Pending Motions: Order that all motions filed by the plaintiff in this federal case be granted.

7. Immediate Payment of Awarded Damages: Require that all awarded damages be paid within 24 hours of the judgment filing.

8. Bar on Appeals: Include a clause that the summary judgment is final and not subject to appeal by the defendants.

VI. Conclusion

The procedural misconduct, strategic bluff, and fraudulent activities of the defendant and his attorneys have fundamentally undermined the judicial process and caused irreparable harm to the plaintiff. The plaintiff respectfully requests that this Court grant the relief requested and ensure that justice is served.

DATE: July 29, 2024

Sincerely,



Nelson Willis

Plaintiff Pro Se Litigant

1405 County Road 208

Gainesville, TX 76240

Phone: 972-533-4126

Email: nelsonwillis3@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 29TH day of JULY, 2024, a true and correct copy of the foregoing Plaintiff's Motion for Summary Judgment and the [Proposed] Order Granting Plaintiff's Motion for Summary Judgment were served upon the following parties via the court's electronic notification email system:

Richard Illmer
Husch Blackwell LLP
1900 N. Pearl St., Suite 1800
Dallas, TX 75201
Email: richard.illmer@huschblackwell.com

Meghann Reeves
Husch Blackwell LLP
1900 N. Pearl St., Suite 1800
Dallas, TX 75201
Email: meghann.reeves@huschblackwell.com

Dated this 29TH day of JULY, 2024.

Respectfully submitted,



Nelson Willis
Plaintiff Pro Se Litigant
1405 County Road 208
Gainesville, TX 76240
Phone: 972-533-4126
Email: nelsonwillis3@gmail.com

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS,
SHERMAN DIVISION

NELSON WILLIS,
Plaintiff,

v.

ADAM M. ARON,
Defendant.

Case No.: 4:23-cv-00732-ALM

JULY 29, 2024

[PROPOSED] ORDER GRANTING SUMMARY JUDGMENT

Before the Court is Plaintiff Nelson Willis's Motion for Summary Judgment. Upon consideration of the motion, the supporting evidence, and the entire record, the Court finds that there is no genuine dispute as to any material fact and that the Plaintiff is entitled to judgment as a matter of law.

IT IS HEREBY ORDERED THAT:

1. Summary Judgment is GRANTED in favor of the Plaintiff, Nelson Willis.
2. The Defendant, Adam M. Aron, is ordered to pay the Plaintiff compensatory damages in the amount of \$500,000.
3. The Defendant, Adam M. Aron, is ordered to pay the Plaintiff punitive damages in the amount of \$25,000,000.
4. The attorneys Richard Illmer and Meghann Reeves, and their law firm, are ordered to pay the Plaintiff punitive damages in the amount of \$25,000,000.
5. The pending criminal harassment charges against the Plaintiff in Leawood, Kansas are DISMISSED.
6. The Plaintiff's pending motions in this federal case are GRANTED.
7. The Defendants shall not be granted immunity from the re-filing of the Plaintiff's amended complaint and the lawsuit against the attorneys.
8. All awarded damages must be paid within 24 hours of the filing of this judgment.
9. This summary judgment is final and not subject to appeal by the Defendants.

IT IS SO ORDERED.

Signed this ____ day of _____, 2024.

Hon. Amos L. Mazzant, III
United States District Judge

Exhibit
1387

Filed: 7/31/2023 4:50 PM
Marci A. Gilbert
District Clerk
Cooke County, Texas
Debrielle Boggs

CAUSE NO. CV23-00179

ADAM M. ARON,

Applicant

v.

NELSON WILLIS,

Respondent.

IN THE DISTRICT COURT

235TH JUDICIAL DISTRICT OF

COOKE COUNTY, TEXAS

NOTICE OF NONSUIT WITHOUT PREJUDICE

TO THE HONORABLE JUDGE:

NOW COME Plaintiff Adam M. Aron and, pursuant to Rule 162 of the TEXAS RULES OF CIVIL PROCEDURE, nonsuits all of the claims asserted against Defendant in the above entitled and numbered cause without prejudice.

Dated: July 31, 2023

Respectfully submitted,

By: /s/ Richard A. Illmer

Richard A. Illmer
State Bar No. 10388350
Rick.Illmer@HuschBlackwell.com
Meghann Reeves
State Bar No. 24094499
Meghann.Reeves@HuschBlackwell.com

HUSCH BLACKWELL, LLP
1900 N. Pearl Street, Suite 1800
Dallas, Texas 75201
(214) 999-6100 Telephone
(214) 999-6170 Facsimile

ATTORNEYS FOR APPLICANT ADAM M. ARON

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served on the pro se party via email through EFile Texas, certified mail, return receipt requested and U.S. First Class Mail on this 31st day of July, 2023 as follows:

VIA CMRR# 9314 8699 0430 0110 4367 93,

EMAIL: NELSONWILLIS3@GMAIL.COM,

& U.S. FIRST CLASS MAIL

Nelson Willis

11667 Highway 82

Whitesboro, TX 76273

/s/ Meghann Reeves

Meghann Reeves

Automated Certificate of eService

This automated certificate of service was created by the efilng system. The filer served this document via email generated by the efilng system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Karen Massey on behalf of Rick Illmer

Bar No. 10388350

karen.massey@huschblackwell.com

Envelope ID: 78058295

Filing Code Description: Notice

Filing Description: Notice of Nonsuit Without Prejudice

Status as of 8/1/2023 8:04 AM CST

Associated Case Party: NELSONWILLIS

Name	BarNumber	Email	TimestampSubmitted	Status
Nelson Willis		nelsonwillis3@gmail.com	7/31/2023 4:50:56 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Richard Allmer		Rick.Illmer@HuschBlackwell.com	7/31/2023 4:50:56 PM	SENT
Meghann DReeves		Meghann.Reeves@HuschBlackwell.com	7/31/2023 4:50:56 PM	SENT

CASE # CV23-00179

COURT: 235TH JUDICIAL DISTRICT

07/26/2024

CAUSE: ALL OTHER CIVIL CASES

STYLE: ADAM M ARON.

VS NELSON WILLIS

PLAINTIFF

NAME _____

ATTORNEY _____

ARON, ADAM M
C/O HUSCH BLACKWELL LLP
1900 N. PEARL STREET
DALLAS, TX 75201

P

ILLMER, RICHARD A
1900 N. PEARL STREET,
SUITE 1800
DALLAS, TEXAS 75201
214-999-6100



DEFENDANT

NAME _____

ATTORNEY _____

WILLIS, NELSON
1405 COUNTY ROAD 208
NELSONWILLIS3@GMAIL.COM
GAINESVILLE, TX 76240

D

TRANSACTIONS FOR ALL PARTIES

/ / THRU / /

05/19/2023	APPLICATION FOR PROTECTIVE ORDER/CS		I	23
ARON, ADAM M				
05/22/2023	CHARGES ASSESSED BY EFILE	350.00-		
ARON, ADAM M	EFILE ENVELOPE ID: 75832855			
05/22/2023	FILING FEE FOR PETITION	213.00	I	1
ARON, ADAM M				
05/22/2023	STATE PAYMENT RECEIVED THRU EFILE	137.00		
ARON, ADAM M	EFILE SUBMITTER ID: MASSEY, KAREN COURT ID: COOKE:D			
06/09/2023	ORDER SETTING HEARING ON ADAM M. ARON'S APPLICATION FOR PROTECTIVE ORDER		I	2
ARON, ADAM M				
06/14/2023	LETTER TO CLERK OF THE COURT REQUESTING SERVICE		I	2
ARON, ADAM M				
06/14/2023	CHARGES ASSESSED BY EFILE	8.00-		
ARON, ADAM M	EFILE ENVELOPE ID: 76599221			
06/14/2023	FEE FOR ISSUANCE OF NOTICE TO SHOW CAUSE	8.00	I	1
ARON, ADAM M				
06/14/2023	NOTICE TO SHOW CAUSE ISSUED TO NELSON WILLIS/EMAIL ED TO ATTORNEY FOR SERVICE/CS		I	2
06/20/2023	NOTICE TO SHOW CAUSE SERVED TO NELSON WILLIS		I	4
ARON, ADAM M				
06/27/2023	APPLICANT ADAM M. ARON'S NOTICE OF SUPPLEMENTAL EVIDENCE IN SUPPORT OF HIS APPLICATION FOR PROTECTIVE ORDER/GR		I	93
ARON, ADAM M	RESPONDENTS AFFIDAVIT IN OPPOSITION TO PETITIONERS APPLICATION FOR A PROTECTIVE ORDER/GR		I	60
07/07/2023	RESPONDENT'S AFFIDAVIT IN OPPOSITION TO PETITIONER 'S APPLICATION FOR A PROTECTIVE ORDER/EMAILLED TO A AGREED MOTION FOR CONTINUANCE/CW		I	1
07/11/2023			I	2
07/12/2023	AMENDED MOTION FOR CONTINUANCE/SIGNED/CW		I	1
07/12/2023	RESPONDENT'S EXHIBIT F/CS EMAILLED TO PETITIONER'S ATTORNEY		I	1
07/13/2023	ORDER ON MOTION FOR CONTINUANCE/EMAILLED TO ATTORNEY YS/CS		I	1

CASE # CV23-00179

DOCKET BOOK REPORT

PAGE 1391

07/26/2024

CAUSE: ALL OTHER CIVIL CASES

07/26/2023	FEE FOR ISSUANCE OF SUBPOENA/CW	8.00-
WILLIS, NELSON		
07/26/2023	FEE FOR ISSUANCE OF SUBPOENA/CW	8.00 I 2
WILLIS, NELSON		
07/26/2023	REQUEST FOR SUBPOENA/CW	I 1
07/26/2023	SUBPOENA DUCES TECUM ISSUED TO JOHN MERRIWETHER/GA VE TO NELSON WILLIS FOR SERVICE/CW	I 2
07/31/2023	NOTICE OF NONSUIT WITHOUT PREJUDICE/DB	I 3
ARON, ADAM M		

ARON, ADAM M

1392
COMPLAINT ASSESSED BY EFILE

06/14/2023

EFILe ENVELOPE ID: 76599221

ARON, ADAM M

Fee for issuance of notice to show cause

06/14/2023

Notice to show cause issued to NELSON WILLIS/EMAIL
ED TO ATTORNEY FOR SERVICE/CS

06/20/2023

Notice to show cause served to NELSON WILLIS

ARON, ADAM M

06/27/2023

APPLICANT ADAM M. ARON'S NOTICE OF SUPPLEMENTAL EVIDENCE IN SUPPORT OF HIS APPLICATION FOR PROTECTIVE ORDER/GR
RESPONDENTS AFFIDAVIT IN OPPOSITION TO PETITIONERS

07/07/2023

APPLICATION FOR A PROTECTIVE ORDER/GR
RESPONDENT'S AFFIDAVIT IN OPPOSITION TO PETITIONER
'S APPLICATION FOR A PROTECTIVE ORDER/EMAILLED TO A
AGREED MOTION FOR CONTINUANCE/CW

07/07/2023

AMENDED MOTION FOR CONTINUANCE/SIGNED/CW

07/12/2023

RESPONDENT'S EXHIBIT F/CS

07/12/2023

EMAILLED TO PETITIONER'S ATTORNEY

07/13/2023

ORDER ON MOTION FOR CONTINUANCE/EMAILLED TO ATTORNEY/CW

DOCKET BOOK REPORT

PAGE 1

CASE # CV23-00179
CAUSE: ALL OTHER CIVIL CASES
STYLE: ADAM M ARON.

COURT: 235TH JUDICIAL DISTRICT
VS NELSON WILLIS

07/26/2024

PLAINTIFF

NAME _____

ARON, ADAM M
C/O HUSCH BLACKWELL LLP
1900 N. PEARL STREET
DALLAS, TX 75201

P

ATTORNEY _____

ILLMER, RICHARD A
1900 N. PEARL STREET,
SUITE 1800
DALLAS, TEXAS 75201
214-999-6100



DEFENDANT

NAME _____

WILLIS, NELSON
1405 COUNTY ROAD 208
NELSONWILLIS3@GMAIL.COM
GAINESVILLE, TX 76240

D

ATTORNEY _____

TRANSACTIONS FOR ALL PARTIES

/ / THRU / /

05/19/2023	APPLICATION FOR PROTECTIVE ORDER/CS	I	23	
ARON, ADAM M				
05/22/2023	CHARGES ASSESSED BY EFILE	350.00-		
ARON, ADAM M	EFILE ENVELOPE ID:75832855			
05/22/2023	FILING FEE FOR PETITION	213.00	I	1
ARON, ADAM M				
05/22/2023	STATE PAYMENT RECEIVED THRU EFILE	137.00		
ARON, ADAM M	EFILE SUBMITTER ID: MASSEY, KAREN COURT ID: COOKE:D			
06/09/2023	ORDER SETTING HEARING ON ADAM M. ARON'S APPLICATION FOR PROTECTIVE ORDER	I	2	
ARON, ADAM M				
06/14/2023	LETTER TO CLERK OF THE COURT REQUESTING SERVICE	I	2	
ARON, ADAM M				
06/14/2023	CHARGES ASSESSED BY EFILE	8.00-		
ARON, ADAM M	EFILE ENVELOPE ID:76599221			
06/14/2023	FEES FOR ISSUANCE OF NOTICE TO SHOW CAUSE	8.00	I	1
ARON, ADAM M				
06/14/2023	NOTICE TO SHOW CAUSE ISSUED TO NELSON WILLIS/EMAIL ED TO ATTORNEY FOR SERVICE/CS	I	2	
ARON, ADAM M	NOTICE TO SHOW CAUSE SERVED TO NELSON WILLIS	I	4	
06/20/2023				
ARON, ADAM M	APPLICANT ADAM M. ARON'S NOTICE OF SUPPLEMENTAL EVIDENCE IN SUPPORT OF HIS APPLICATION FOR PROTECTIVE ORDER/GR	I	93	
07/07/2023	RESPONDENTS AFFIDAVIT IN OPPOSITION TO PETITIONERS APPLICATION FOR A PROTECTIVE ORDER/GR	I	60	
07/07/2023	RESPONDENT'S AFFIDAVIT IN OPPOSITION TO PETITIONER 'S APPLICATION FOR A PROTECTIVE ORDER/EMAILED TO A	I	1	
07/11/2023	AGREED MOTION FOR CONTINUANCE/CW	I	2	
07/12/2023	AMENDED MOTION FOR CONTINUANCE/SIGNED/CW	I	1	
07/12/2023	RESPONDENT'S EXHIBIT F/CS	I	1	
07/13/2023	EMAILLED TO PETITIONER'S ATTORNEY			
07/13/2023	ORDER ON MOTION FOR CONTINUANCE/EMAILLED TO ATTORNEY YS/CS	I	1	

Backspace

Shuttle FINE
POND

CLERK OF THE COURT
MARCI A. GILBERT
COOKE COUNTY COURTHOUSE
101 SOUTH DIXON, ROOM 207
GAINESVILLE, TX 76240

ATTORNEY REQUESTING ISSUANCE
NELSON WILLIS, PRO-SE
1405 CR 208
GAINESVILLE, TEXAS 76240

THE STATE OF TEXAS
SUBPOENA DUCES TECUM
NO. CV23-00179

ADAM M. ARON VS NELSON WILLIS

TO ANY SHERIFF, CONSTABLE, OR BY ANY OTHER PERSON WHO IS NOT A PARTY AND IS NOT LESS THAN EIGHTEEN YEARS OF AGE, OF THE STATE OF TEXAS, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON: JOHN MERRIWETHER/VICE PRESIDENT,
INVESTOR RELATIONS
AMC ENTERTAINMENT HOLDINGS
11500 ASH STREET
LEAWOOD, KANSAS 66211

to be and to personally appear on the 7th of AUGUST 2023, at 2:00 p.m.; before the Honorable 235th District Court of Cooke County, Texas, to be held within and for said County at the Courthouse thereof, in Gainesville, then and there to testify and the truth to speak on behalf of the Respondent, in the above styled and numbered cause, now pending in said Court, and there to remain from day to day, and from term to term, until discharged by said Court. Said above named witness is further commanded to produce and permit inspection and copying at said time and place above set forth the following books, papers, documents or other tangible things, to-wit:

IT IS FURTHER ORDERED that JOHN MERRIWETHER is to produce and permit inspection and copying of designated documents or tangible things in JOHN MERRIWETHER'S possession, custody, or control that pertain to her services rendered as a receiver in this matter as follows:

1. TESTIMONY UNDER CROSS EXAMINATION

HEREIN FAIL NOT, and make do return hereof, showing how you have executed the same.
FAILURE BY ANY PERSON WITHOUT ADEQUATE EXCUSE TO OBEY A SUBPOENA SERVED UPON THAT PERSON MAY BE DEEMED A CONTEMPT OF THE COURT AND MAY BE PUNISHED BY FINE OR CONFINEMENT, OR BOTH.

Issued and given under my hand and seal of said Court at office, this the 26th day of JULY 2023.

MARCI A. GILBERT, DISTRICT CLERK
COOKE COUNTY, TEXAS

BY: Celeste Walterscheid
Celeste Walterscheid, Deputy Clerk



CM
COURT CLERK-JUDGE
29 JUL 28 AM 2016

IN THE DISTRICT COURT OF JOHNSON COUNTY, KANSAS

Adam M. Aron
Plaintiff/Petitioner

CASE NO. 23CV04089
DIVISION 12
K.S.A. NO. _____

v6

Nelson Willis

Defendant/Respondent

SUBPOENA

TO: John Merriweather - Vice President - Investor Relations
11500 Ash Street AMC Entertainment Holdings, Inc.
Leawood, Kansas 66211

You are commanded to appear
before the Honorable 235th
District Court of Cooke County, Texas
at 101 S. Dixon Gainesville, Texas 76240
on the 2nd day of August 2023, at 2:00 P.M. to testify on
behalf of the Respondent in the above entitled action.

Bring with you the following:

Copies of All Emails with Shareholders from
March 14th, 2023 through March 30, 2023
regarding The Vote for the Reverse Split? Merge of
PEV

(SEAL)

DATED: 7-27-23

Attorney: Nelson Willis Pro Se

Nelson Willis

Clerk of the District Court

BY: John M. Aron



6:44

95

Johnson County Kansas District Court

CASE NO 23CV04089 ARON vs. WILLIS

Div/Judge 12/K CHRISTOPHER JAYARAM

Chapter 60

Nature OTHER MISCELLANEOUS-TERM

Status TERMINATED

07/31/2023 FILE STAMP 07/31/2023, SHERIFF RETURN JO CO KS,
SUBPOENA SERVED JOHN MERRIWETHER 07/31/2023 E/S

07/28/2023 PETITION AND SUBPOENA ISSUED TO THE SHERIFF OF JO
CO KS "JOHN MERRIWETHER"

07/28/2023 FILE STAMP 7/28/2023, SUBPOENA

07/28/2023 FILE STAMP 7/28/2023, REQUEST AND SERVICE
INSTRUCTION FORM

07/28/2023 FILE STAMP 7/28/2023, SUBPOENA DUCES TECUM (CV23-
00179 TEXAS)

07/28/2023 PAID BY NELSON WILLIS III 11874065, Received Amount:
\$211.50 , Credit Card: , Receipt NO: 23023445

07/28/2023 Defense Attorney PRO SE assigned on 07/28/23 Def Pro Se address:
1405 COUNTY RD 208, GAINESVILLE, TX 76240

07/28/2023 Plt Pro Se address: 11500 ASH STREET, LEAWOOD, KS 66211

07/28/2023 Judge: K CHRISTOPHER JAYARAM Assigned to Case

07/28/2023 NEW CASE FILED; ADAM M ARON VS NELSON WILLIS;
FILING FEE WAIVED

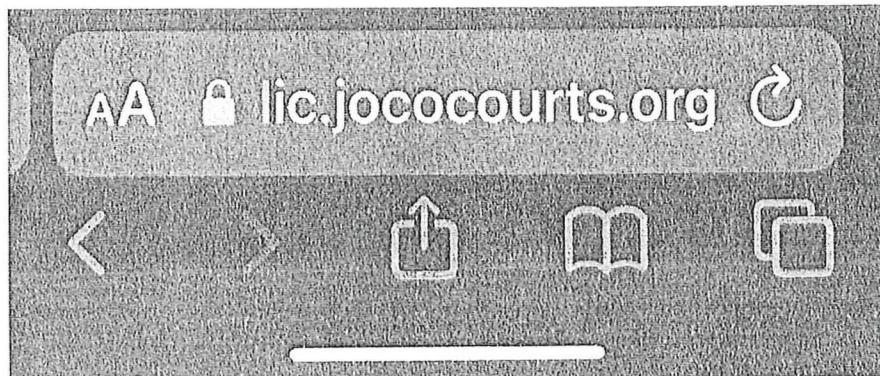


EXHIBIT B

JURY, PROSE

U.S. District Court
Eastern District of TEXAS [LIVE] (Sherman)
CIVIL DOCKET FOR CASE #: 4:23-cv-00732-ALM-KPJ
Internal Use Only

Willis v. Aron
Assigned to: District Judge Amos L. Mazzant, III
Referred to: Magistrate Judge Kimberly C Priest Johnson
Cause: Civil Miscellaneous Case

Date Filed: 08/14/2023
Jury Demand: Plaintiff
Nature of Suit: 360 P.I.: Other
Jurisdiction: Diversity

Plaintiff

Nelson Willis

represented by **Nelson Willis**
1405 County Road 208
Gainesville, TX 76240
972-533-4126
Email: nelsonwillis3@gmail.com
PRO SE

V.

Defendant

Adam M. Aron

represented by **Richard A Illmer**
Husch Blackwell LLP
1900 N Pearl Street
Suite 1800
Dallas, TX 75201
214/999-6100
Fax: 12149996170
Email: rick.illmer@huschblackwell.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Meghann Diane Reeves
Husch Blackwell LLP
Texas
1900 N, Pearl Street, Suite 1800
Dallas, TX 75201
214-999-6123
Fax: 214-999-6170
Email:
meghann.reeves@huschblackwell.com
ATTORNEY TO BE NOTICED

FILED IN DISTRICT COURT
COOKE COUNTY, TEXAS
2024 JUL 30 AM 11:52
DIST CLERK-MARSHA GILBERT
BY: Chawteachuid
DEPUTY

Date Filed	#	Docket Text
------------	---	-------------

08/14/2023	<u>1</u>	COMPLAINT against Adam M. Aron, filed by Nelson Willis. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Civil Cover Sheet)(xl,) (Entered: 08/15/2023)
08/14/2023		Case Assigned to District Judge Amos L. Mazzant, III and Magistrate Judge Kimberly C Priest Johnson. (xl,) (Entered: 08/15/2023)
08/14/2023		In accordance with the provisions of 28 USC Section 636(c), you are hereby notified that a U.S. Magistrate Judge of this district court is available to conduct any or all proceedings in this case including a jury or non-jury trial and to order the entry of a final judgment. The form <u>Consent to Proceed Before Magistrate Judge</u> is available on our website. All signed consent forms, excluding pro se parties, should be filed electronically using the event <u>Notice Regarding Consent to Proceed Before Magistrate Judge</u> . (xl,) (Entered: 08/15/2023)
08/14/2023		(Court only) ***Set/Clear Flags: Jury (xl,) (Entered: 08/15/2023)
08/14/2023		Filing fee: \$ 402, receipt number 6-65307. (xl,) Modified on 8/15/2023 (xl,). (Entered: 08/15/2023)
08/14/2023	<u>2</u>	Non-prisoner pro se consent to receive electronic notice filed by Nelson Willis. (xl,) (Entered: 08/15/2023)
08/15/2023	<u>3</u>	SUMMONS Issued as to Adam M. Aron. (baf,) (Entered: 08/15/2023)
08/24/2023	<u>4</u>	Summons Returned Unexecuted by Nelson Willis as to Adam M. Aron. (Attachments: # <u>1</u> Additional Attachment(s))(daj,) (Entered: 08/24/2023)
09/06/2023	<u>5</u>	Letter to the Judge from Plaintiff, Nelson Willis, re attempted service of summons. (daj,) (Entered: 09/06/2023)
09/06/2023	<u>6</u>	MOTION for the Federal Court to Serve Process of a Federal Summons Upon the Defendant by Nelson Willis. (Attachments: # <u>1</u> EXHIBIT A)(baf,) (Entered: 09/06/2023)
10/04/2023	<u>7</u>	ORDER denying <u>6</u> Motion to Serve Process of Federal Summons. Signed by Magistrate Judge Kimberly C Priest Johnson on 10/4/2023..(rpc,) (Entered: 10/05/2023).
11/13/2023	<u>8</u>	NOTICE of Personal Service on Defendant (Attachments: # <u>1</u> Additional Attachment(s))(jmb,) (Entered: 11/14/2023)
11/15/2023	<u>9</u>	SUMMONS Returned Executed by Nelson Willis. Adam M. Aron served on 11/9/2023, answer due on 11/30/2023. (jmb,) (Entered: 11/16/2023)
11/30/2023	<u>10</u>	MOTION to Dismiss Pursuant to Rule 12(b)(6) and Brief in Support by Adam M. Aron. (Attachments: # <u>1</u> Exhibit A - 2023-11-28 CERTIFIED COPY - Docket Book Report - Case # CV23-00179, # <u>2</u> Proposed Order Granting Defendant Adam M. Aron's Motion to Dismiss Pursuant to Rule 12(b)(6)) (Illmer, Richard) (Entered: 11/30/2023)
11/30/2023	<u>11</u>	Fed. R. Civ. P. 7.1(a)(1) AND (2) Disclosure Statement filed by Adam M. Aron (Illmer, Richard) (Entered: 11/30/2023)
12/08/2023	<u>12</u>	MOTION for Protective Order Against Plaintiff Nelson Willis by Adam M. Aron. (Attachments: # <u>1</u> Exhibit A - Business Records Affidavit, # <u>2</u> Exhibit B - Affidavit of Adam M. Aron, # <u>3</u> Proposed Order Protective Order)(Illmer, Richard) (Entered: 12/08/2023)
12/12/2023	<u>13</u>	MOTION for Extension of Time to File Response to <u>10</u> MOTION to Dismiss and <u>12</u> MOTION for Protective Order by Nelson Willis. (rpc,) (Entered:

12/13/2023) 1399

12/20/2023	14	RESPONSE to Motion re <u>13</u> MOTION for Extension of Time to File Response/Reply as to <u>10</u> MOTION to Dismiss <i>Pursuant to Rule 12(b)(6) and Brief in Support</i> , <u>12</u> MOTION for Protective Order <i>Against Plaintiff Nelson Willis filed by Adam M. Aron</i> . (Attachments: # 1 Proposed Order Granting Plaintiff's Motion for Enlargement of Time)(Illmer, Richard) (Entered: 12/20/2023)
12/20/2023	15	(Ex Parte) NOTICE Regarding Consent to Proceed Before U.S. Magistrate Judge filed by Adam M. Aron (Illmer, Richard) (Entered: 12/20/2023)
12/20/2023	16	ORDER granting <u>13</u> MOTION for Extension of Time to File Response to <u>10</u> MOTION to Dismiss and <u>12</u> MOTION for Protective Order. Responses due by 1/26/2024. Signed by Magistrate Judge Kimberly C Priest Johnson on 12/20/2023. (rpc,) (Entered: 12/21/2023)
01/12/2024	17	MOTION for Extension of Time to File Response to <u>10</u> MOTION to Dismiss and <u>12</u> MOTION for Protective Order by Nelson Willis. (jmb,) (Entered: 01/12/2024)
01/17/2024	18	STATUS REPORT <i>Defendant Adam M. Aron's Unilateral Status Report</i> by Adam M. Aron. (Illmer, Richard) (Entered: 01/17/2024)
01/19/2024	19	RESPONSE to Motion re <u>17</u> MOTION for Extension of Time to File Response/Reply as to <u>10</u> MOTION to Dismiss <i>Pursuant to Rule 12(b)(6) and Brief in Support</i> , <u>12</u> MOTION for Protective Order <i>Against Plaintiff Nelson Willis filed by Adam M. Aron</i> . (Illmer, Richard) (Entered: 01/19/2024)
01/22/2024	20	ORDER granting <u>17</u> MOTION for Extension of Time to File Response. IT IS ORDERED that Plaintiff shall have until February 16, 2024, to file a response to the Motion to Dismiss (Dkt. <u>10</u>) and the Motion for Protective Order (Dkt. <u>12</u>). Defendant shall have seven (7) days from the date the response is served to file their reply, if any. See LOC. R. CV-7(f). Signed by Magistrate Judge Kimberly C Priest Johnson on 1/22/2024. (jmb,) (Entered: 01/22/2024)
01/31/2024	21	NOTICE of Discovery Disclosure by Adam M. Aron <i>Defendant Adam M. Aron's Notice of Disclosure</i> (Illmer, Richard) (Entered: 01/31/2024)
02/05/2024	22	NOTICE of Attorney Appearance by Meghann Diane Reeves on behalf of Adam M. Aron (Reeves, Meghann) (Entered: 02/05/2024)
02/07/2024	23	MOTION for Extension of Time to File Response to <u>10</u> MOTION to Dismiss and <u>12</u> MOTION for Protective Order by Nelson Willis. (rpc,) (Entered: 02/07/2024)
02/14/2024	24	RESPONSE in Opposition re <u>23</u> MOTION for Extension of Time to File Response/Reply as to <u>10</u> MOTION to Dismiss <i>Pursuant to Rule 12(b)(6) and Brief in Support</i> , <u>12</u> MOTION for Protective Order <i>Against Plaintiff Nelson Willis filed by Adam M. Aron</i> . (Attachments: # 1 Proposed Order Denying Plaintiff's Motion for Extension of Time)(Reeves, Meghann) (Entered: 02/14/2024)
02/26/2024	25	MEMORANDUM OPINION AND ORDER granting <u>23</u> MOTION for Extension of Time to File Response/Reply as to <u>10</u> MOTION to Dismiss <i>Pursuant to Rule 12(b)(6) and Brief in Support</i> , <u>12</u> MOTION for Protective Order <i>Against Plaintiff Nelson Willis filed by Nelson Willis</i> . Plaintiff shall have until March 15, 2024, to file a response to the Motion to Dismiss (Dkt. 10) and the Motion for Protective Order (Dkt. 12) that complies with the Federal Rules

			of Civil Procedure and Local Rules. Defendant shall have seven (7) days from the date the response is served to file his reply, if any. See LOC. R. CV-7(f). Signed by Magistrate Judge Kimberly C Priest Johnson on 2/26/2024. (dlw,) (Entered: 02/26/2024)
03/11/2024	<u>26</u>		MOTION for Extension of Time to File by Nelson Willis. (Attachments: # <u>1</u> Exhibit A - Part 1 of 3, # <u>2</u> Exhibit A - Part 2 of 3, # <u>3</u> Exhibit A - Part 3 of 3) (rpc,) (Entered: 03/12/2024)
03/13/2024	<u>27</u>		RESPONSE in Opposition re <u>26</u> MOTION for Extension of Time to File <i>filed by Adam M. Aron.</i> (Attachments: # <u>1</u> Proposed Order)(Illmer, Richard) (Entered: 03/13/2024)
03/13/2024	✉ <u>28</u>		MOTION to Compel <i>Initial Disclosures</i> by Adam M. Aron. (Attachments: # <u>1</u> Exhibit A - Email Chain, # <u>2</u> Proposed Order)(Illmer, Richard) (Entered: 03/13/2024)
03/25/2024	<u>29</u>		REPLY to <u>27</u> Response to Motion re <u>26</u> MOTION for Extension of Time to File <i>filed by Nelson Willis.</i> (RPC) (Entered: 03/25/2024)
04/08/2024	<u>30</u>		MEMORANDUM OPINION AND ORDER. The Fourth Motion for Extension (Dkt. <u>26</u>) is GRANTED IN PART and DENIED IN PART. IT IS ORDERED that Plaintiff shall file his response, if any, to the Motion to Dismiss (Dkt. <u>10</u>) and the Motion for Protective Order (Dkt. <u>12</u>) no later than April 15, 2024. The Court will grant no further extensions to Plaintiff related to his responses to the Motion to Dismiss (Dkt. <u>10</u>) and the Motion for Protective Order (Dkt. <u>12</u>). Defendant shall have seven (7) days from the date the response is served to file his reply, if any. Signed by Magistrate Judge Kimberly C Priest Johnson on 4/8/2024. (rpc) Modified docket text on 4/9/2024 (rpc). (Entered: 04/08/2024)
04/08/2024			(Court only) ***Motions terminated: <u>26</u> MOTION for Extension of Time to File <i>filed by Nelson Willis.</i> (rpc) (Entered: 04/09/2024)
04/15/2024		<u>31</u>	(Ex Parte) SEALED Ex Parte Letter filed by Nelson Willis. (rpc) (Entered: 04/16/2024)
04/15/2024	<u>32</u>		RESPONSE to <u>10</u> MOTION to Dismiss and <u>12</u> MOTION for Protective Order <i>filed by Nelson Willis.</i> (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit C, # <u>3</u> Exhibit D, # <u>4</u> Exhibit E, # <u>5</u> Exhibit F, # <u>6</u> Exhibit G, # <u>7</u> Exhibit H, # <u>8</u> Exhibit I, # <u>9</u> Exhibit J, # <u>10</u> Proposed Order)(rpc) (Entered: 04/16/2024)
04/22/2024	<u>33</u>		REPLY to Response to Motion re <u>10</u> MOTION to Dismiss <i>Pursuant to Rule 12(b)(6) and Brief in Support filed by Adam M. Aron.</i> (Illmer, Richard) (Entered: 04/22/2024)
04/22/2024	<u>34</u>		REPLY to Response to Motion re <u>12</u> MOTION for Protective Order <i>Against Plaintiff Nelson Willis filed by Adam M. Aron.</i> (Illmer, Richard) (Entered: 04/22/2024)
05/14/2024	<u>35</u>		MOTION for Emergency Halt and Cease-and-Desist Request Pursuant to Rule 65 of the Federal Rules of Civil Procedure by Nelson Willis. (Attachments: # <u>1</u> Proposed Order) (jmb) (Entered: 05/15/2024)
05/28/2024	<u>36</u>		RESPONSE in Opposition re <u>35</u> MOTION [Motion for Emergency Halt and Cease-and-Desist Request Pursuant to Rule 65 of the Federal Rules of Civil Procedure] <i>filed by Adam M. Aron.</i> (Attachments: # <u>1</u> Exhibit A - Memorandum Opinion, # <u>2</u> Proposed Order Denying Plaintiff's Motion for Emergency Halt and Cease-and-Desist Request)(Illmer, Richard) (Entered: 05/28/2024)

05/30/2024	<u>37</u>	MOTION for Temporary Restraining Order by Nelson Willis. (Attachments: # <u>1</u> Exhibit A and D, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit E, # <u>5</u> Exhibit F, # <u>6</u> Proposed Order)(rpc) (Entered: 05/30/2024)
06/04/2024	<u>38</u>	EMERGENCY MOTION to Establish Status Quo Regarding AMC Shareholder Meeting by Nelson Willis. (Attachments: # <u>1</u> Proposed Order)(baf) (Entered: 06/04/2024)
06/05/2024	<u>39</u>	REPORT AND RECOMMENDATIONS re <u>35</u> MOTION [Motion for Emergency Halt and Cease-and-Desist Request Pursuant to Rule 65 of the Federal Rules of Civil Procedure] filed by Nelson Willis, <u>38</u> MOTION filed by Nelson Willis, <u>37</u> MOTION for Temporary Restraining Order filed by Nelson Willis. The Court recommends the Motions for Injunction (Dkts. 35; 37; 38) be DENIED. Signed by Magistrate Judge Kimberly C Priest Johnson on 6/5/24. (sjc) (Entered: 06/05/2024)
06/06/2024	<u>40</u>	RESPONSE (OBJECTIONS) to <u>39</u> Report and Recommendations <i>filed by Nelson Willis.</i> # <u>1</u> Proposed Order) (baf). (Entered: 06/06/2024)
06/06/2024	<u>41</u>	MOTION to Remove Magistrate Judge by Nelson Willis. (baf) # <u>1</u> Proposed Order) (baf). (Entered: 06/06/2024)
06/10/2024	✉ <u>42</u>	MOTION to Move Case Directly to Discovery Phase: Rule 16(b)(1) - Pretrial and notification of FOIA Response Indicating Ongoing SEC Investigation - Evidence of Continued Malicious Prosecution by Nelson Willis. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Proposed Order) (rpc) (Entered: 06/11/2024)
06/11/2024	<u>43</u>	Additional Attachments to Main Document: <u>42</u> MOTION, SUPPLEMENTAL CERTIFICATE OF SERVICE. (baf) (Entered: 06/11/2024)
06/11/2024	✉ <u>44</u>	Supplemental Objections to <u>39</u> Report and Recommendations, Discovery Request, and MOTION for FRCP Rule 35 Mental Evaluation Request, by Nelson Willis. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Additional Attachment(s), # <u>5</u> Proposed Order)(rpc) (Entered: 06/12/2024)
06/14/2024	<u>45</u>	REQUEST THE CLERK OF THE COURT TO ADMIT EXHIBIT X IN SUPPORT OF DOCUMENT <u>44</u> FILED JUNE 11,2024 by Nelson Willis (Attachments: # <u>1</u> Proposed Order, # <u>2</u> Exhibit X) (jmb) (Entered: 06/14/2024)
06/18/2024	✉ <u>46</u>	MOTION to Notify the Court of Intent to File Additional Lawsuit Against Defendant Aron's Attorneys Richard A. Illmer and Meghann Reeves by Nelson Willis. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Proposed Order)(rpc) (Entered: 06/18/2024)
06/18/2024	✉ <u>47</u>	MOTION for Judiciary Complaint by Nelson Willis. (Attachments: # <u>1</u> Exhibit A)(rpc) (Entered: 06/20/2024)
06/20/2024	<u>48</u>	RESPONSE to <u>40</u> Response to Non-Motion, <u>41</u> Motion for Miscellaneous Relief <i>filed by Adam M. Aron.</i> (Attachments: # <u>1</u> Proposed Order Denying Plaintiff's Objection to Report and Recommendation and Motion to Remove) (Illmer, Richard) (Entered: 06/20/2024)
06/20/2024	<u>49</u>	REPLY to <u>36</u> Response to Motion re <u>35</u> MOTION for Emergency Halt and Cease-and-Desist Request Pursuant to Rule 65 of the Federal Rules of Civil Procedure <i>filed by Nelson Willis.</i> (rpc) (Entered: 06/20/2024)
06/20/2024	<u>50</u>	RESPONSE to <u>48</u> Response to <u>40</u> Objections to Report and Recommendation; and <u>41</u> Motion, <i>filed by Nelson Willis.</i> (Attachments: # <u>1</u> Exhibit A, # <u>2</u>

		Proposed Order)(rpc) (Entered: 06/20/2024)
06/24/2024	<u>51</u>	RESPONSE in Opposition re <u>42</u> MOTION to Move Case Directly to Discovery Phase filed by Adam M. Aron. (Attachments: # <u>1</u> Proposed Order)(Illmer, Richard) (Entered: 06/24/2024)
06/24/2024	<u>52</u>	MOTION to Unseal Documents and Evidence by Nelson Willis. (Attachments: # <u>1</u> Proposed Order) (jmb) Modified text on 6/24/2024 (xl). (Entered: 06/24/2024)
06/24/2024	<u>53</u>	PLAINTIFF'S OBJECTION TO DEFENDANT ADAM M. ARON'S RESPONSE <u>51</u> TO PLAINTIFF'S MOTION TO MOVE CASE DIRECTLY TO DISCOVERY PHASE <u>42</u> (jmb) (Entered: 06/24/2024)
06/24/2024	<u>54</u>	SECONDARY NOTICE TO THE COURT REGARDING CONTINUED MALICIOUS PROSECUTION by Nelson Willis (Attachments: # <u>1</u> Exhibit A) (jmb) (Entered: 06/24/2024)
06/25/2024	<u>55</u>	RESPONSE to <u>44</u> Motion for Miscellaneous Relief, filed by Adam M. Aron. (Attachments: # <u>1</u> Proposed Order Denying Plaintiff's Supplemental Objection to Report and Recommendation)(Illmer, Richard) (Entered: 06/25/2024)
06/25/2024	<u>56</u>	REPLY to <u>55</u> Response to <u>44</u> Supplemental Objections to <u>39</u> Report and Recommendations, Discovery Request, and MOTION for FRCP Rule 35 Mental Evaluation Request, filed by Nelson Willis. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Proposed Order)(rpc) (Entered: 06/25/2024)
07/01/2024	<u>57</u>	Emergency MOTION to Compel Immediate Production of Emails, Text Messages, and Other Communications Pursuant to Federal Rule of Civil Procedure 37(a) by Nelson Willis. (Attachments: # <u>1</u> Proposed Order)(rpc) (Entered: 07/01/2024)
07/02/2024	<u>58</u>	RESPONSE in Opposition re <u>46</u> MOTION Defendant Adam M. Aron's Response to Plaintiff's Motion to Notify Court of Intent to File Additional Lawsuit filed by Adam M. Aron. (Attachments: # <u>1</u> Proposed Order Denying Plaintiff's Motion to Notify Court of Intent to File Additional Lawsuit)(Illmer, Richard) (Entered: 07/02/2024)
07/02/2024	<u>59</u>	RESPONSE in Opposition re <u>47</u> MOTION Defendant Adam M. Aron's Response to Plaintiff's Motion for Judiciary Complaint Against Magistrate Judge filed by Adam M. Aron. (Attachments: # <u>1</u> Proposed Order Denying Plaintiff's Motion for Judiciary Complaint against Magistrate Judge)(Illmer, Richard) (Entered: 07/02/2024)
07/02/2024	<u>60</u>	PLAINTIFF'S RESPONSE TO DEFENDANT ADAM M. ARON'S RESPONSE <u>58</u> TO PLAINTIFF'S MOTION TO NOTIFY COURT OF INTENT TO FILE ADDITIONAL LAWSUIT <u>46</u> filed by Nelson Willis. (Attachments: # <u>1</u> Proposed Order) (jmb) (Entered: 07/02/2024)
07/03/2024	<u>61</u>	EMERGENCY MOTION to Compel this Court for the Issue of Federal Bench Warrants, Forensic Audits, and Additional Relief by Nelson Willis. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B)(baf) (Entered: 07/03/2024)
07/03/2024	<u>62</u>	RESPONSE to <u>59</u> Response in Opposition to Motion filed by Nelson Willis. (baf) (Entered: 07/03/2024)
07/08/2024	<u>63</u>	RESPONSE in Opposition re <u>52</u> MOTION to Unseal Document filed by Adam M. Aron. (Attachments: # <u>1</u> Proposed Order)(Illmer, Richard) (Entered: 07/08/2024)

07/08/2024	<u>64</u>	REPLY to Response to <u>52</u> MOTION to Unseal Document <i>filed by Nelson Willis.</i> (Attachments: # <u>1</u> Proposed Order)(rpc) (Entered: 07/08/2024)
07/08/2024	<u>65</u>	MOTION for Civil Remedies and Request for Grand Jury Investigation Based on Alleged Securities Fraud, Mail and Wire Fraud, Conspiracy to Commit Fraud, insider Trading, and False Statements Under Federal Law, and Theft, Securities Fraud, Fraudulent Transfer, Conspiracy, and Misapplication of Fiduciary Property Under Texas Law and Delaware Law by Nelson Willis. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E, # <u>6</u> Exhibit 5.1, # <u>7</u> Proposed Order)(rpc) (Entered: 07/08/2024)
07/09/2024	<u>66</u>	Supplemental Filing in Support of <u>65</u> MOTION for Civil Remedies and Requests for Grand Jury Investigation to Clarify and Correct. (rpc) (Entered: 07/09/2024)
07/12/2024	<u>67</u>	Supplemental 2 Filing in Support of <u>65</u> MOTION for Civil Remedies and Requests for Grand Jury Investigation. (Attachments: # <u>1</u> Exhibit, # <u>2</u> Proposed Order)(rpc) (Entered: 07/12/2024)
07/15/2024	<u>68</u>	RESPONSE in Opposition re <u>57</u> MOTION to Compel <i>Immediate Production of Emails, Text Messages, and Other Communications Pursuant to FRCP 37(a) filed by Adam M. Aron.</i> (Attachments: # <u>1</u> Proposed Order)(Illmer, Richard) (Entered: 07/15/2024)
07/16/2024	<u>69</u>	REPLY to <u>68</u> Response to <u>57</u> MOTION to Compel <i>Immediate Production of Emails, Text Messages, and Other Communications Pursuant to FRCP 37(a) filed by Nelson Willis.</i> (Attachments: # <u>1</u> Proposed Order)(rpc) (Entered: 07/16/2024)
07/17/2024	<u>70</u>	RESPONSE in Opposition re <u>61</u> MOTION to <i>Compel This Court for the Issuance of Federal Bench Warrants, Forensic Audits, and Additional Relief filed by Adam M. Aron.</i> (Attachments: # <u>1</u> Proposed Order)(Illmer, Richard) (Entered: 07/17/2024)
07/17/2024	<u>71</u>	MEMORANDUM ADOPTING REPORT AND RECOMMENDATION OF UNITED STATES MAGISTRATE JUDGE. Plaintiff's Objections (Dkt. # <u>40</u>) are OVERRULED and the Magistrate Judge's Report (Dkt. # <u>39</u>) is ADOPTED as the findings and conclusions of the Court. IT IS ORDERED that the Motions for Injunction (Dkts. # <u>35</u> ; <u>37</u> <u>38</u>) are DENIED. Signed by District Judge Amos L. Mazzant, III on 7/17/2024. (rpc) (Entered: 07/17/2024)
07/18/2024	<u>72</u>	MEMORANDUM OPINION AND ORDER. IT IS ORDERED that the Motion for Recusal (Dkt. <u>41</u>) is DENIED. Signed by Magistrate Judge Kimberly C Priest Johnson on 7/18/2024. (rpc) (Entered: 07/19/2024)
07/22/2024	<u>73</u>	RESPONSE to Motion re <u>65</u> MOTION for <i>Civil Remedies and Request for Grand Jury Investigation filed by Adam M. Aron.</i> (Attachments: # <u>1</u> Proposed Order Proposed Order)(Illmer, Richard) (Entered: 07/22/2024)
07/22/2024	<u>74</u>	PLAINTIFF S OBJECTION TO MEMORANDUM (71 ADOPT NG REPORT AND RECOMMENDATION'(39) OF UNITED STATES MAGISTRATE JUDGE ANDMEMORANDUM OPINION AND ORDER (72) <i>filed by Nelson Willis.</i> (Attachments: # <u>1</u> Proposed Order, # <u>2</u> Exhibit 1, # <u>3</u> Exhibit 2, # <u>4</u> Exhibit 3, # <u>5</u> Exhibit 4)(knp) (Entered: 07/22/2024)
07/22/2024	<u>75</u>	PLAINTIFF'S REPLY TO DEFENDANT'S RESPONSE (DKT. 73) TO MOTION FOR CIVIL REMEDIES AND REQUEST FOR GRAND JURY

		INVESTIGATION(DKT. 65) filed by Nelson Willis. (Attachments: # <u>1</u> Proposed Order)(knp) (Entered: 07/22/2024)
07/22/2024	76 <u>76</u>	PLAINTIFF'S MOTION TO REMOVE DISTRICT JUDGE by Nelson Willis. (Attachments: # <u>1</u> Proposed Order)(knp) (Entered: 07/22/2024)
07/23/2024	77 <u>77</u>	Emergency MOTION for Halt, Cease and Desist, and Establish and Maintain the Status Quo by Nelson Willis. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit X, # <u>4</u> Proposed Order)(rpc) (Entered: 07/23/2024)
07/23/2024	78 <u>78</u>	MOTION Alleging Fraudulent Conveyance and Demand for Immediate Action by Nelson Willis. (Attachments: # <u>1</u> Proposed Order)(rpc) (Entered: 07/23/2024)
07/24/2024	<u>79</u>	Supplemental filing in Support of <u>78</u> MOTION Alleging Fraudulent Conveyance and Demand for Immediate Action. (Attachments: # <u>1</u> Exhibit 5.1) (baf) (Entered: 07/24/2024)

EXHIBIT-C

Attachment No.	Description	Case reference
EXHIBIT A	Comparison of Adam M. Aron Signatures from different documents and years.	4:23-CV-732-ALM-KPJ

Date	Document / Source	Signature
June 6, 2021	Social Media Platform X, Open Letter to shareholders: "Voting for the July 29 AMC Annual Shareholder Meeting begins on June 16. Here is my letter to investors, contained in the preliminary proxy materials filed on June 4 for approval by the SEC. AMC Shareholders, I strongly encourage you to vote. #AMCVoteMakeYourVoiceHeard."	See you at the movies!  Adam Aron
July 4, 2022	Social Media Platform X, Picture with Shareholder with signature	

FILED IN DISTRICT COURT
COOKE COUNTY, TEXAS
2024 JUL 30 AM 1:52
DIST CLERK-MARCI A GILBERT
BY: Quinton Scheid
REPUTY



Forged Signature

CAUSE NO. _____

ADAM ARON,

§
§
§
§
§
§
§
§

IN THE DISTRICT COURT

v.

NELSON WILLIS,

Respondent.

_____ JUDICIAL DISTRICT OF

COOKE COUNTY, TEXAS

AFFIDAVIT OF ADAM M. ARON

STATE OF KANSAS §

COUNTY OF JOHNSON §

Before me, the undersigned authority, personally appeared Adam M. Aron, who being by me duly sworn, deposed as follows:

1. My name is Adam M. Aron. I am over 18 years of age, and I am fully competent to make this Affidavit. The facts stated within this Affidavit are true and correct and are within my personal knowledge.

2. I am the Chairman and Chief Executive Officer of AMC Entertainment Holdings, Inc. ("AMC").

3. Since April 3, 2023, I have received harassing, threatening, and offensive emails to my AMC work email address (AAron@amctheatres.com) from an individual named Nelson Willis using the email address "nelsonwillis3@gmail.com." Many of these emails contain hateful speech directed at me, which qualify as ethnic slurs. Many of these emails were also sent to AMC's Investor Relations corporate email address (InvestorRelations@amctheatres.com).

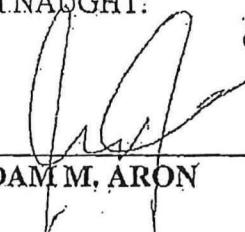
4. On April 10, 2023, Mr. Willis began including "Chair@sec.gov" and "CommissionerPeirce@sec.gov" as recipients of many of these emails.

5. Despite receiving no response from me, Mr. Willis has continued to send these harassing, threatening, and offensive emails to me and about me to others. On Monday, April 17, 2023, he sent *ten* harassing, threatening, and offensive emails to me, including others as recipients.

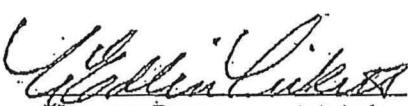
6. Willis' repeated emails to me and about me to others have caused me to feel harassed, annoyed, alarmed, tormented, embarrassed, and offended.

7. I ask the Court for protection from Willis as set forth in my Application for Protective Order.

8. FURTHER, THE AFFIDANT SAYETH NAUGHT:


ADAM M. ARON

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on this 5th day of May, 2023.


NOTARY PUBLIC IN AND FOR
THE STATE OF KANSAS



August 4, 2022	Social Media Platform X, Open Letter to shareholders	<p>All throughout this effort with you, I always have been c you. I promised you we would be bold. Well, indeed, my best regards to you all,</p> <p>Adam Aron Chairman and CEO</p> <p>Proud to Offer the Most Movie Theatres in the World</p>
May 5, 2023	COOKE COUNTY, TEXAS AFFIDAVIT OF ADAM M. ARON	<p>AYETH NAUGHT.</p> <p>ADAM M. ARON</p>
July 23, 2023	Social Media Platform X, Open Letter: My open letter message below to you all is on a subject of existential importance to AMC Entertainment shareholders. I urge you to read it. Adam Aron #AMCSurviveThenThrive	<p>INTEGRITY IN AMERICA AND THE bor — go see dazzling images on</p> <p>Sincerely, [REDACTED] copy? [REDACTED]</p> <p>Adam Aron</p> <p>Chairman and CEO</p> <p>AMC Entertainment</p>
August 14, 2023	Social Media Platform X, Open Letter	

Attachment No.	Description	Case reference
EXHIBIT A	Defendant Social Media X Post announcing the March 14, 2023 vote outcome	4:23-CV-732-ALM-KPJ



Adam Aron @CEOAdam · 14.03.23

Today was a huge step forward for AMC. You voted YES, YES & YES! And it was a landslide **vote** too — 88% yes for Proposal 1, 87% yes for Proposal 2, and 87% yes for Proposal 3. My sincerest thanks for giving AMC the tools we need to continue fighting the good fight on your behalf.



1.802 1.908 6.422 636K

✓ Exhibit
ID

1 REPORTER'S RECORD
2 VOLUME 1 OF 1 VOLUME
3 TRIAL COURT CAUSE NO. CV23-00179

4 ADAM M. ARON) (IN THE DISTRICT COURT
5 VS.) (COOKE COUNTY, TEXAS
6 NELSON WILLIS) (235TH JUDICIAL DISTRICT

7 HEARING ON APPLICATION FOR PROTECTIVE ORDER

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

FILED IN DISTRICT COURT
COOKE COUNTY, TEXAS

2024 JUL 30 AM 11:52

DIST CLERK: MARCIA GILBERT

BY: Watamura
DEPUTY

On the 21st day of July, 2023, the following
proceedings came on to be held in the above-entitled and
numbered cause before the HONORABLE JANELLE M. HAVERKAMP,
Judge Presiding, held in Gainesville, Cooke County, Texas.

Proceedings reported by computerized stenotype machine.

1 APPEARANCES

2 HUSCH BLACKWELL
3 BY: MEGHANN REEVES
4 SBOT NO. 24049592
5 1900 N. Pearl Street, Suite 1800
6 Dallas, Texas 75201-2467
7 Telephone: (214) 981-7025
8 ATTORNEY FOR THE APPLICANT;

9
10 NELSON WILLIS
11 APPEARING PRO SE.

12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

VOLUME 1

HEARING ON APPLICATION FOR PROTECTIVE ORDER
JULY 21, 2023

		<u>Page</u>	<u>Vol</u>
5	Caption	1	1
6	Appearances of Counsel	2	1
7	Proceedings	4	1
8	Court Reporter's Certificate	14	1
9	(No witnesses to index this volume.)		
10	(No exhibits to index this volume.)		
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

PROCEEDINGS

(JULY 21, 2023.)

(Open court, no jury.)

4 THE COURT: The Court calls Cause Number
5 CV23-00179, Adam M. -- is it Aron?

6 MS. REEVES: Aron.

7 THE COURT: -- Aron versus Nelson Willis --
8 Applicant, versus Nelson Willis, Respondent.

9 Now, is Applicant present and ready?

10 MS. REEVES: Yes, Your Honor.

11 THE COURT: Where is Applicant?

12 MS. REEVES: Oh. Mr. Aron is not here today.
13 We submitted an affidavit.

14 THE COURT: I -- and by whose authority did
15 you think you could come in here and submit evidence by an
16 affidavit?

17 MS. REEVES: I -- Your Honor, we did not
18 clarify that with you.

19 THE COURT: I -- you were -- I'm not allowing
20 you to -- no one asked permission of the Court --

21 MS. REEVES: We --

22 THE COURT: -- and --

23 MS. REEVES: Your Honor, we -- we followed
24 the Texas criminal statute relating to protective orders.

25 | It did not mention --

1 THE COURT: Where -- where -- I am not
2 allowing you to submit evidence by affidavit. Show me where
3 you -- you can present evidence by affidavit for the -- the
4 final hearing, not a temporary ex parte protective order.

5 MS. REEVES: Your Honor, I'm only aware of
6 Article 7B.001, the application for --

7 THE COURT: Say again.

8 MS. REEVES: I'm -- the authority I'm aware
9 of is from Article 7B.001, application for protective order.

10 THE COURT: Article 7B. Where are you
11 looking?

12 MS. REEVES: It is in the Code of Criminal
13 Procedure, Title 1.

14 MR. WILLIS: I have it printed out, Your
15 Honor.

16 THE COURT: No one asked you a thing.

17 You can present affidavits on the temporary
18 ex parte protective order. 7B.101. What section?

19 MS. REEVES: So it's .001. And this relates
20 to the application, Your Honor.

21 THE COURT: For the ex parte order.

22 MS. REEVES: This is the -- the only part --
23 section of this chapter that's dealing with the protective
24 order.

25 THE COURT: 101. In the same manner as an

1 application for a protective order under Title 4 of the
2 Family Code. And if you'll go to the Family Code, the only
3 protective order that can be issued by affidavit is the ex
4 parte.

5 MS. REEVES: Your Honor --

6 THE COURT: That's the original ex parte
7 without a hearing.

8 MS. REEVES: Your Honor, the -- the Family
9 Code we did not think applied in this situation.

10 THE COURT: At any proceeding related to an
11 offense under 42.072 in which the defendant appears before
12 the court, a person may request the court to issue a
13 protective order under Title 4, Family Code, for the
14 protection of the person.

15 The request under Subsection (a) is made by
16 filing an application for a protective order in the same
17 manner as an application for a protective order under Title
18 4, Family Code.

19 The court shall issue a protective order in
20 the manner provided by Title 4, Family Code, if, in lieu of
21 the finding that family violence occurred and is likely to
22 occur in the future as required by Section 85.001, Family
23 Code, the court finds that: Probable cause exists to
24 believe that an offense under Section 42.072, Penal Code,
25 was committed.

1 The nature of the scheme or course of conduct
2 engaged in by the defendant in committing the offense
3 indicates the defendant is likely in the future to engage in
4 conduct prohibited by Section 42.072(a)(1), (2), or (3).

11 MS. REEVES: Under the Article 7B, when you
12 go to the Section .003, that sets out the issuance of the
13 protective order.. There's also another subsection within
14 Article 7B that talks about when the title -- the family
15 section would apply. I cannot remember off the top of my
16 head which one it is. I don't have that one printed. It
17 might be .008 or --

18 THE COURT: The court shall issue a
19 protective order in the manner provided by Title 4 of the
20 Family Code.

21 Well, I'm telling you that I am not going to
22 issue a permanent -- I think that you're wrong. You
23 could -- you could prove me wrong. So far you have not.
24 But I am telling you that I am not going to issue a
25 permanent protective order by affidavit.

1 MS. REEVES: Yes, Your Honor.

2 THE COURT: The consequences for a violation
3 of a protective order are too serious. I believe that he's
4 got the right to confront his accuser --

5 I don't need any help from you.

6 -- in a court of law. So the Applicant will
7 have to be present in this Court if he wants to pursue the
8 protective order. I do not give permission for this to be
9 submitted by affidavit, so we will postpone it to give him
10 the opportunity.

11 But one thing I need to make very clear to
12 you, Mr. Willis, based upon what you have attempted to file
13 in this case, this hearing will only be about the
14 application for protective order. This is not your
15 opportunity to engage in any kind of civil lawsuit for,
16 against the Applicant for breach of fiduciary duty or
17 anything about your issues with him with regard to
18 diminished value of stock or anything to do with stock.
19 That is a whole nother issue. It has nothing to do with
20 whether or not you have committed the offense of stalking
21 against him. You understand that?

22 MR. WILLIS: I do, Your Honor.

23 THE COURT: The only issue in this Court is
24 should I issue a protective order against you for your
25 conduct. If they can prove to me that you have engaged in

1 stalking, and whether or not I should issue a protective
2 order. Have you engaged in stalking? Is it likely you will
3 continue to engage in stalking? That's the only issue
4 before the Court.

5 So I'm going to require him to appear in
6 person. So we will reset this. I -- I would consider
7 perhaps allowing him to appear by Zoom, unless there's a
8 reason not to, but not by affidavit. That does not give him
9 the right to confront and cross-examine his accusers.

10 So we need to reset.

11 Yes.

12 MR. WILLIS: In regards to my communications
13 with the Petitioner.

14 THE COURT: Who?

15 MR. WILLIS: With the Petitioner. With the
16 Applicant.

17 THE COURT: Yes.

18 MR. WILLIS: My only communications with
19 him -- okay. Let me start out by saying --

20 THE COURT: Okay. I'm not hearing the case
21 today.

22 MR. WILLIS: Well, I'm a congestive heart
23 failure patient, okay. And the date of this -- I'm a
24 shareholder.

25 THE COURT: Are you --

1 MR. WILLIS: I'm not a stalker, okay. I'm a
2 shareholder.

3 THE COURT: Okay. Mr. Willis, I'm not
4 hearing the case today.

5 MR. WILLIS: Well, I'm just going to say one
6 thing. My e-mails were to their investor relations, and
7 then they ignored me because of the shareholder vote on
8 March 14th. And I was in the hospital that day.

11 MR. WILLIS: Well, I'm just saying that
12 they're trying to come at me outside of the actual
13 shareholder. And they're trying --

14 THE COURT: I'm not hearing the case today.

15 MR. WILLIS: Well, they're trying to silence
16 me as a whistleblower to the SEC, and that's a --

17 THE COURT: And, further, there's a proposed
18 order that's been submitted that wants me to include any --
19 that no further communication to the SEC. That is beyond
20 the scope of this protective order.

21 MR. WILLIS: Yeah. That is against --

22 | THE COURT: I don't need your help.

23 MR. WILLIS: -- my constitutional rights.

24 THE COURT: Don't need your help.

25 MR. WILLIS: Yes, ma'am.

1 THE COORDINATOR: We can do it on August 7th,
2 11:00 a.m. or that afternoon we have time.

3 MS. REEVES: Okay. May I get a few dates to
4 be able to discuss with Mr. Aron?

5 MR. WILLIS: May I say one last thing?

6 | THE COURT: . Just a moment.

10 MS. REEVES: Your Honor, with your suggestion
11 on potentially we may be able to do it via Zoom, do we need
12 to do a formal request with you for that?

13 | THE COURT: Yes.

14 MS. REEVES: Okay.

15 THE COURT: Mr. Willis, are you opposed to
16 the Applicant appearing via Zoom?

17 MR. WILLIS: I am worried about witnesses
18 that -- attending via Zoom or what have you.

19 THE COURT: Do you have witnesses to whether
20 or not you sent these e-mails?

21 MR. WILLIS: I have lots of them.

22 THE COURT: That whether or not you sent the
23 e-mails? I don't want to hear anybody that's going to talk
24 about --

25 MR. WILLIS: No. I -- okay.

1 THE COURT: -- the stock.

2 MR. WILLIS: My e-mails -- my e-mails are not
3 about Mr. Aron as a person. They are about him as a CEO.

4 THE COURT: Well --

5 MR. WILLIS: And that's what this whole thing
6 is about.

7 THE COURT: -- that's not the issue. The
8 issue is did you send the e-mails to Mr. Aron?

9 MR. WILLIS: As a shareholder and exercising
10 my shareholder rights.

11 THE COURT: I don't care if you sent them as
12 the Easter bunny.

13 MR. WILLIS: They are strictly --

14 THE COURT: Did you send them?

15 MR. WILLIS: It is my shareholder right to
16 communicate with the CEO. He -- the CEO actually --

17 THE COURT: It is not your shareholder right
18 to communicate in vulgar, threatening and harassing manner.

19 MR. WILLIS: That's first amendment of the
20 Constitution, my first -- free speech.

21 THE COURT: Well, you can argue that next
22 time.

23 Okay. So reset.

24 MR. WILLIS: Okay. So we're going to --

25 THE COURT: We'll set it now August 7th at

1 what time?

2 MR. WILLIS: We're going to continue --

3 THE COURT: Don't interrupt me.

4 MR. WILLIS: Yes, ma'am.

5 THE COURT: What time?

6 THE COORDINATOR: 2:00 p.m.

7 THE COURT: August 7th at 2:00 unless we hear
8 that -- right now that's -- it's set August 7th at 2:00 p.m.

9 We're adjourned. We'll see you back
10 August 7th at 2:00 p.m. As of now all parties in person.

11 (End of proceedings.)

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 STATE OF TEXAS

2 COUNTY OF COOKE

3 I, Denise A. Neu, Deputy Court Reporter in and for
4 the 235th Judicial District Court of Cooke County, State of
5 Texas, do hereby certify that the above and foregoing
6 contains a true and correct transcription of all portions of
7 evidence and other proceedings requested in writing by
8 counsel for the parties to be included in this volume of the
9 Reporter's Record, in the above-styled and numbered cause,
10 all of which occurred in open court or in chambers and were
11 reported by me.

12 I further certify that this Reporter's Record of
13 the proceedings truly and correctly reflects the exhibits,
14 if any, offered by the respective parties.

15 I further certify that the total cost for the
16 preparation of this Reporter's Record is \$78.00, and was
17 paid by Mr. Nelson Wilson.

18 WITNESS my hand this the 14th day of December,
19 2023.

20 /s/ Denise Neu
21 DENISE A. NEU, Texas CSR #6110
22 Deputy Court Reporter
23 235th District Court
24 Cooke County, Texas
P.O. Box 352
Lindsay, Texas 76250
Telephone: (940) 391-3170
Expiration: 04/30/24

25